

July 10, 2020

**MEMORANDUM ENDORSEMENT****Via ECF Only**

The Honorable Gabriel W. Gorenstein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: Yong Sung Kim v. Pal Berg and PV Holding Corp.**  
**SDNY Docket No.: 20-cv-03344**  
**LJAA File No.: 0372.1014.NY00**

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Dear Judge Gorenstein:

Please allow the following to serve as a joint letter to Your Honor in accordance with Your Honor's Individual Rules of Practice. The parties are currently discussing a voluntary dismissal of PV Holding Corp. in this matter, potentially avoiding the need for motion practice. As such, Defendant PV Holding Corp. respectfully requests a two-week extension of the deadline to file its dispositive motion based on the Graves amendment. The deadline would be extended from July 13, 2020 to July 27, 2020. Plaintiff's counsel Shane Sullivan has consented to this extension. This is the first request for an extension with respect to PV Holding Corp.'s motion for summary judgment.

The parties also take this opportunity to advise the Court that Plaintiff's process server has advised him service of process upon Pal Berg pursuant to the Hague Convention will take 3-4 months.


Very truly yours,

*Kevin D. Clinton*

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**Extension to July 27, 2020, granted.**  
**So Ordered.**

  
GABRIEL W. GORENSTEIN  
United States Magistrate Judge  
July 10, 2020

cc: **Via ECF and Electronic Mail Delivery Only**  
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